

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Naji Chammout

CHAPTER 13

CASE NO. 19-55006-MAR

JUDGE MARK A RANDON

Debtor

/

TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee requests that debtor treat the notice of post-petition mortgage fees filed by Colonial Savings in the Order Confirming Plan to be paid directly by the debtor.
2. As debtor's entire budget for a family of six (6) is only \$2,022.34 per month after deducting the mortgage and insurance payments and that a portion of debtor's income is from unemployment benefits that will end, Trustee questions the feasibility of debtor's Chapter 13 Plan pursuant to 11 U.S.C. § 1325(a)(6). Trustee requests an update at confirmation as to when debtor anticipates re-opening Westborn Studios.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

Dated: August 11, 2020

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARGARET CONTI SCHMIDT

Krispen S. Carroll (P49817)

Margaret Conti Schmidt (P42945)

719 Griswold Street, Ste 1100

Detroit, MI 48226

(313) 962-5035

notice@det13ksc.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Naji Chammout

CHAPTER 13

CASE NO. 19-55006-MAR

JUDGE MARK A RANDON

Debtor _____ /

CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

FAIRMAX LAW
1 PARKLANE BLVD
SUITE 729 E
DEARBORN, MI 48126

August 11, 2020

/s/ Shannon Horton _____

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit

719 Griswold Street, Ste 1100

Detroit, MI 48226

(313) 962-5035

notice@det13ksc.com